

# **Bay Area Air Quality Management District**

939 Ellis Street  
San Francisco, CA 94109  
(415) 771-6000

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**Final**

## **MAJOR FACILITY REVIEW PERMIT**

**Issued To:**

**Fleischmann's Yeast  
A Division of Burns Philp Food Inc.  
Facility #A2300**

**Facility Address:**

921 98th Avenue  
Oakland, CA 94603

**Mailing Address:**

921 98th Avenue  
Oakland, CA 94603

**Responsible Official**

James Parker, Plant Manager  
(510) 633-2229

**Facility Contact**

James Parker, Plant Manager  
(510) 633-2229

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**Type of Facility:** Yeast Manufacturing  
**Primary SIC:** 2099  
**Product:** Commercial Yeast

**ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT**

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Ellen Garvey, Air Pollution Control Officer

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Date

Facility Name: Fleischmann's Yeast  
Final Permit for Facility #: A2300  
Expiration Date: 07/01/2002  
ID: KRD

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## I. STANDARD CONDITIONS

### A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 11/3/93);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 11/10/82);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 6/7/95);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 6/23/95);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 6/7/95);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 10/19/84); and

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 6/15/94).

### B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit expires on July 1, 2002. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than January 1, 2002 and no earlier than July 1, 2001. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after June 30, 2002.** (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)

## **I. Standard Conditions (continued)**

5. The filing of a request by the facility for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

### **C. Requirement to Pay Fees**

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

### **D. Inspection and Entry**

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

### **E. Records**

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

## **I. Standard Conditions (continued)**

### **F. Monitoring Reports**

All required monitoring reports must be submitted to the District at least once every six months. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported to the District's Compliance and Enforcement Division within 10 days of the discovery of the incident. Within 30 days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. (Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

### **G. Compliance Certification**

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division  
USEPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

### **H. Emergency Provisions**

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)

## **I. Standard Conditions (continued)**

3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement unless the Major Facility Review Permit has been modified pursuant to Regulation 2, Rule 6. (MOP Volume II, Part 3, §4.8)

### **I. Severability**

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

### **J. Accidental Release**

This facility is subject to 40 CFR Part 68, Chemical Accident Prevention Provisions. The permit holder shall submit a risk management plan (RMP) by the date specified in §68.10. The permit holder shall also certify compliance with the requirements of Part 68 as part of the annual compliance certification, as required by Regulation 2, Rule 6. (40 CFR Part 68, Regulation 2, Rule 6)

## II. EQUIPMENT LIST

### A. Permitted Source List

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2-1-302.

**Table II-A**

S-#	Description	Make or Type	Model	Capacity
S-1	Steam Boiler	BMW Sterling	W style	37 MMBtu/hr; natural gas, fuel oil
S-2	Steam Boiler	Zurn Keystone, low NOx burners, flue gas recirculation	SN 100385	40 MMBtu/hr; natural gas, fuel oil
S-3	Yeast Dryer	Bepex Fluid Bed	Custom	180 ft <sup>2</sup> , steam heat
S-10	Fermenter #2	Custom	Custom	55,826 gallons
S-11	Fermenter #3	Custom	Custom	59,843 gallons
S-12	Fermenter #4	Custom	Custom	55,826 gallons
S-13	Fermenter #7	Custom	Custom	18,916 gallons
S-14	Fermenter A	Custom	Custom	61,260 gallons
S-15	Fermenter B	Custom	Custom	61,291 gallons

### B. Abatement Device List

**Table II-B**

A-#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Required Efficiency
A-3	Wet Cyclone Scrubber	S-3	BAAQMD Cond. #14319 Part 2 (BACT)	50,000 scfm	0.01 g/dscf

### III. GENERAL APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s):  
The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP:  
The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

Where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit.

**Table III**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>FE (Y/N)</b>
BAAQMD Regulation 1	General Provisions and Definitions (11/3/93)	N
SIP Regulation 1	General Provisions and Definitions (11/10/82)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/6/90)	Y
BAAQMD Regulation 5	Open Burning (11/2/94)	N
SIP Regulation 5	Open Burning (5/3/84)	Y
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	N
SIP Regulation 6	Particulate Matter and Visible Emissions (5/3/84)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	N
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (11/16/83)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N



### III. General Applicable Requirements (continued)

**Table III** (continued)

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>FE (Y/N)</b>
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants - Sulfur Dioxide (3/15/95)	N
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants - Sulfur Dioxide (5/3/84)	Y
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	N
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y

#### IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Regulation Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s):  
The dates of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP:  
The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date.

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. Additionally, where an applicable requirement is a SIP requirement, the full language of the SIP requirement is included in Appendix A of this permit. All other text may be found in the regulations themselves.

**Table IV-A**  
**S-1: Steam Boiler #1**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Inorganic Gaseous Pollutants - Sulfur Dioxide (3/15/95)</b>		
9-1-301	Limitations on Ground Level Concentrations	N	
9-1-302	General Emission Limitations, or 9-1-304	Y	
9-1-304	Fuel Burning - Liquid and Solid Fuels, or 9-1-302	Y	
<b>SIP Regulation 9, Rule 1</b>	<b>PROVISIONS NO LONGER IN CURRENT RULE</b> <b>Inorganic Gaseous Pollutants - Sulfur Dioxide (5/3/84)</b>		
9-1-301	Limitations on Ground Level Concentrations	Y <sup>1</sup>	
<b>BAAQMD Regulation 9, Rule 7</b>	<b>Inorganic Gaseous Pollutants - Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (9/16/92)</b>		
9-7-111	Limited Exemption; Low Fuel Usage	N	

#### IV. Source-Specific Applicable Requirements (continued)

**Table IV-A (continued)**  
**S-1: Steam Boiler #1**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
9-7-304	Low Fuel Usage Requirements	N	
9-7-304.2	Operating Standard, Tuning	N	
9-7-305	Natural Gas Curtailment - Non-Gaseous Fuel	N	
9-7-305.1	Performance Standard, NOx	N	
9-7-305.2	Performance Standard, CO	N	
9-7-306	Equipment Testing - Non-Gaseous Fuel	N	
9-7-306.1	Performance Standard, NOx	N	
9-7-306.2	Performance Standard, CO	N	
9-7-306.3	Operating Standard, Equipment Testing	N	
9-7-501	Combinations of Different Fuels	N	
9-7-502	Modified Maximum Heat Input	N	
9-7-503	Records	N	
9-7-503.1	§304.2 Records	N	
9-7-503.2	Records, Curtailment	N	
9-7-503.3	§306.3 Records	N	
9-7-503.4	§403 Records and Record Retention	N	
9-7-504	Low Fuel Use - Monitoring and Records	N	
9-7-504.1	Monitoring - Throughput	N	
9-7-504.2	Records - Usage, HHV, Record Retention	N	
9-7-603	Compliance Determination	N	
9-7-604	Tune-Up Procedures	N	
<b>BAAQMD Condition # 12681</b>			
part 1	Therm Usage (basis: Regulation 9-7-111)	N	
part 2	Usage Meter or Alternate District-approved Method (basis: Regulation 9-7-504)	N	

<sup>1</sup> This section of the SIP rule has been removed from or revised in the current BAAQMD rule. Nevertheless, the source must comply with this SIP requirement until US EPA has reviewed and approved the District's revisions of the regulation.

#### IV. Source-Specific Applicable Requirements (continued)

**Table IV-B  
S-2: Steam Boiler #2**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable/ (Y/N)</b>	<b>Future Effective Date</b>
<b>BAAQMD Regulation 9, Rule 1</b>	<b>Inorganic Gaseous Pollutants - Sulfur Dioxide (3/15/95)</b>		
9-1-301	Limitations on Ground Level Concentrations	N	
9-1-302	General Emission Limitations, or 9-1-304	Y	
9-1-304	Fuel Burning - Liquid and Solid Fuels, or 9-1-302	Y	
<b>SIP Regulation 9, Rule 1</b>	<b>PROVISIONS NO LONGER IN CURRENT RULE Inorganic Gaseous Pollutants - Sulfur Dioxide (5/3/84)</b>		
9-1-301	Limitations on Ground Level Concentrations	Y <sup>1</sup>	
<b>BAAQMD Regulation 9, Rule 7</b>	<b>Inorganic Gaseous Pollutants - Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (9/16/92)</b>		
9-7-301	Emission Limits - Gaseous Fuel	N	
9-7-301.1	Performance Standard, NOx	N	
9-7-301.2	Performance Standard, CO	N	
9-7-302	Emission Limits - Non-Gaseous Fuel	N	
9-7-302.1	Performance Standard, NOx	N	
9-7-302.2	Performance Standard, CO	N	
9-7-303	Emission Limits - Gaseous and Non-Gaseous Fuel, NOx and CO	N	
9-7-305	Natural Gas Curtailment - Non-Gaseous Fuel	N	
9-7-305.1	Performance Standard, NOx	N	
9-7-305.2	Performance Standard, CO	N	
9-7-306	Equipment Testing - Non-Gaseous Fuel	N	
9-7-306.1	Performance Standard, NOx	N	
9-7-306.2	Performance Standard, CO	N	
9-7-306.3	Operating Standard, Equipment Testing	N	
9-7-501	Combinations of Different Fuels	N	
9-7-502	Modified Maximum Heat Input	N	
9-7-503	Records	N	
9-7-503.1	§304.2 Records	N	

#### IV. Source-Specific Applicable Requirements (continued)

**Table IV-B (continued)**  
**S-2: Steam Boiler #2**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
9-7-503.2	Records, Curtailment	N	
9-7-503.3	§306.3 Records	N	
9-7-503.4	§403 Records and Record Retention	N	
9-7-603	Compliance Determination	N	
<b>BAAQMD Condition # 260</b>			
part 1	Fuel oil firing situational limit (basis: Cumulative Increase)	Y	
part 2	Fuel oil usage and sulfur concentration limits (basis: Cumulative Increase)	Y	
part 3	Recordkeeping Requirements (basis: BAAQMD Regulation 2-6-409 and 501)	Y	

<sup>1</sup> This section of the SIP rule has been removed from or revised in the current BAAQMD rule. Nevertheless, the source must comply with this SIP requirement until US EPA has reviewed and approved the District's revisions of the regulation.

#### IV. Source-Specific Applicable Requirements (continued)

**Table IV-C  
S-3: Yeast Dryer**

<b>Applicable Requirement</b>	<b>Regulation Title or Description of Requirement</b>	<b>Federally Enforceable (Y/N)</b>	<b>Future Effective Date</b>
<b>BAAQMD Regulation 6</b>	<b>Particulate Matter and Visible Emissions (12/19/90)</b>		
6-301	Ringelmann No. 1 Limitation	N	
6-305	Visible Particles	Y	
6-310	Particle Weight Limitation	Y	
6-401	Appearance of Emissions	Y	
<b>SIP Regulation 6</b>	<b>PROVISIONS NO LONGER IN CURRENT RULE Particulate Matter and Visible Emissions (5/3/84)</b>		
6-301	Ringelmann Number 1 Limitation	Y <sup>1</sup>	
<b>BAAQMD Condition # 14319</b>			
part 1	Particulate concentration limit (basis: BACT)	Y	
part 2	Abatement requirement (basis: BACT)	Y	

<sup>1</sup> This section of the SIP rule has been removed from or revised in the current BAAQMD rule. Nevertheless, the source must comply with this SIP requirement until US EPA has reviewed and approved the District's revisions of the regulation.

#### IV. Source-Specific Applicable Requirements (continued)

**Table IV-D**  
**S-10: Fermenter #2**  
**S-11: Fermenter #3**  
**S-12: Fermenter #4**  
**S-13: Fermenter #7**  
**S-14: Fermenter A**  
**S-15: Fermenter B**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
<b>BAAQMD Regulation 8 Rule 2</b>	<b>Organic Compounds - Miscellaneous Operations (6/15/94)</b>		
8-2-111	Exemption - Food Preparation; Provided the best modern practices are used.	Y	
<b>BAAQMD Condition # 13149</b>			
part 1	Fermenter gas carbon concentration limits (basis: Regulation 8-2-111, RACT)	Y	
part 2	Fermenter off-property odor correction or abatement requirement (basis: Regulation 1-301)	N	
part 3	Records (basis: Regulation 2-6-501)		
part 3a	Fermenter mash ethanol concentrations (basis: Regulation 8-2-111, RACT)	Y	
part 3b	Yeast production data and measurements (basis: AB-2588)	N	
part 3c	VOC instrument calibration records (basis: Regulation 8-2-111, RACT)	Y	

<sup>1</sup> This section of the SIP rule has been removed from or revised in the current BAAQMD rule. Nevertheless, the source must comply with this SIP requirement until US EPA has reviewed and approved the District's revisions of the regulation.

## **V. SCHEDULE OF COMPLIANCE**

The permit holder shall continue to comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

## **VI. PERMIT CONDITIONS**

Any condition that is preceded by an asterisk is not federally enforceable.

### **A. Source Specific Permit Conditions**

#### **Condition 12681**

For S-1 Steam Boiler #1

- \* 1. Not more than 89,000 therms per year shall be used at S-1. [basis: Regulation 9-7-111]
- \* 2. To demonstrate compliance with condition 1, the owner/operator shall install and maintain a non-resettable totalizing meter for each fuel type, unless the operator applies for and receives written approval from the District to use an alternate method for measuring the cumulative annual fuel usage. [basis: Regulation 9-7-504]

#### **Condition 260**

For S-2 Steam Boiler #2

- 1. Firing on fuel oil shall be permitted only during curtailment of natural gas by PG & E or for short test periods lasting not longer than 2 hours per month. [basis: Cumulative Increase]
- 2. The total fuel oil usage for Source #2 shall not exceed either 2,150 gallons/day of fuel oil containing a maximum of 0.5% sulfur by weight or 3,500 gallons per day of fuel oil containing a maximum of 0.15% sulfur by weight. [basis: Cumulative Increase]



## VI. Permit Conditions (continued)

### A. Source Specific Permit Conditions (continued)

#### Condition 260 (continued)

For S-2 Steam Boiler #2

3. The following records shall be maintained in a District-approved log. These records shall be kept on site and made available for District inspection for at least 5 years from the date on which the record was made. [basis: Cumulative Increase, Regulation 2-6-409.2, and 2-6-501]
  - a) daily fuel oil use
  - b) vendor certifications of sulfur content or laboratory test result of sulfur content for each fuel oil shipment received

#### Condition 14319

For Yeast Dryer S-3

1. The concentration of particulates in dryer S-3 exhaust gas, after abatement, shall not exceed 0.01 grains per dry standard cubic foot. [basis: BACT, Cumulative Increase]
2. The yeast dryer S-3 shall be abated by wet cyclone scrubber A-3 during all periods of operation. Wet cyclone scrubber A-3 shall be properly operated and maintained. [basis: BACT]

#### Condition 13149

For Fermenters S-10, S-11, S-12, S-13, S-14 and S-15

1. The total carbon concentration in the exhaust gas from sources S-10, S-11, S-12, S-13, S-14 and S-15 shall not exceed the following limits on a dry basis, averaged over the batch duration. [basis: Regulation 8-2-111, RACT]

Fermentation Type	Fermentation Products	Offgas VOC Concentration (as carbon)
Trade First Generation Stock	Liquid Yeast for Sale	300 ppmv
	Pitch Yeast for Trade	450 ppmv
	Pitch Yeast for First Generation	900 ppmv

## **VI. Permit Conditions (continued)**

### **A. Source Specific Permit Conditions (continued)**

#### **Condition 13149 (continued)**

For Fermenters S-10, S-11, S-12, S-13, S-14 and S-15:

- \* 2. Fermenters causing an off-property odor nuisance problem per District Regulations 7-302 or 1-301, shall be managed to reduce or contain odors to comply with District regulations. Within 72 hours of the incident, the owner/operator shall submit to the District, a summary of the problem(s) causing the odor and clearly outline all corrective and/or preventive measures taken. [basis: Regulation 1-301]
- 3. The following records shall be maintained in a District approved log. These records shall be kept on site and made available for District inspection for at least 5 years from the date on which the record was made. (basis: Regulation 2-6-501)
  - a) The mash ethanol concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch, and the average carbon concentration shall be calculated and recorded for each batch to demonstrate compliance with condition 1 above. The facility shall demonstrate annually, the correlation between the mash ethanol concentration and the exhaust gas VOC concentration. These data shall be used to update the correlation factor on an annual basis and within 30 days of the permit renewal date. A report detailing the data and the changes to the correlation factor shall be submitted to the District for review and approval within 30 days of the annual renewal date. [basis: Regulation 8-2-111, RACT]
  - \* b) All yeast production data and measurements needed to determine actual emissions from the facility annually. [basis: AB2588]
    - i) The number of each type of yeast batch (trade, stock, or first generation), and
    - ii) The annual production of yeast from each type of fermentation process.
    - iii) The average air flow rate for each type of fermentation.
  - c) The VOC measuring instrument calibrations shall be recorded. [basis: Regulation 8-2-111, RACT]

### **B. Facility-wide Permit Conditions**

None

## VII. APPLICABLE EMISSION LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

**Table VII-A**  
**S-1: Steam Boiler #1**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
All	BAAQMD Regulation 9-7-111	N		< 90,000 therms/12 months	Regulation 9-7-504	C	meter and fuel records or alternate District-approved method
	Condition #12681, part 1	N		≤ 89,000 therms/year	Condition #12681, part 2	C	meter and fuel records or alternate District-approved method
SO <sub>2</sub>	BAAQMD Regulation 9-1-301	N		GLC > 0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes or 0.05 ppm averaged over 24 hrs	None	N	

## VII. Applicable Emission Limits & Compliance Monitoring Requirements (continued)

**Table VII-A (continued)**  
**S-1: Steam Boiler #1**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	SIP Regulation 9-1-301	Y		Federal std: GLC of 140 ppb, 24-hr average, once/yr and 30 ppb, annual average State std: GLC of 40 ppb, 24-hr average, and 250 ppb, 1 hr average	None	N	
	BAAQMD Regulation 9-1-302	Y		≤ 300 ppm SO <sub>2</sub> , dry	None	N	
	BAAQMD Regulation 9-1-304	Y		≤ 0.5% by weight, fuel sulfur conc.	Condition #260, part 3b	P/E	sulfur certifications or analysis
NO <sub>x</sub>	BAAQMD Regulation 9-7-305.1	N		150 ppmv dry, @ 3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-306.1	N		150 ppmv dry, @ 3% O <sub>2</sub>	None	N	
NO <sub>x</sub> and CO	BAAQMD Regulation 9-7-306.3	N		48 hours non-gaseous fuel testing	Regulation 9-7-503.3	P/M	test records
CO	BAAQMD Regulation 9-7-305.2	N		400 ppmv dry, @ 3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-306.2	N		400 ppmv dry, @ 3% O <sub>2</sub>	None	N	

## VII. Applicable Emission Limits & Compliance Monitoring Requirements (continued)

**Table VII-B**  
**S-2: Steam Boiler #2**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
All	Condition #260, part 2	Y		fuel oil use $\leq$ 2 hrs/month or during natural gas curtailment	None	N	
	Condition #260, part 3	Y		2,150 gallons/day fuel oil containing $\leq$ 0.5 wt% sulfur or 3,500 gallons/day fuel oil containing $\leq$ 0.15 wt% sulfur	Condition #260, part 4	fuel oil usage - P/D sulfur content - P/E	usage records  sulfur certifications or analysis
SO <sub>2</sub>	BAAQMD Regulation 9-1-301	N		GLC $>$ 0.5 ppm continuously for 3 consecutive minutes or 0.25 ppm averaged over 60 consecutive minutes or 0.05 ppm averaged over 24 hrs	None	N	
	SIP Regulation 9-1-301	Y		Federal std: GLC of 140 ppb, 24-hr average, once/yr and 30 ppb, annual average State std: GLC of 40 ppb, 24-hr average, and 250 ppb, 1 hr average	None	N	
	BAAQMD Regulation 9-1-302	Y		$\leq$ 300 ppm SO <sub>2</sub> , dry	None	N	
	BAAQMD Regulation 9-1-304	Y		$\leq$ 0.5% by weight, fuel sulfur concentration	Condition #260, part 4	P/E	records

## VII. Applicable Emission Limits & Compliance Monitoring Requirements (continued)

**Table VII-B (continued)**  
**S-2: Steam Boiler #2**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
NOx	BAAQMD Regulation 9-7-301.1	N		30 ppmv @ 3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-302.1	N		40 ppmv @ 3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-303	N		30 to 40 ppmv @ 3% O <sub>2</sub> , weighted average	None	N	
	BAAQMD Regulation 9-7-305.1	N		150 ppmv dry, @ 3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-306.1	N		150 ppmv dry, @ 3% O <sub>2</sub>	None	N	
CO	BAAQMD Regulation 9-7-301.2	N		400 ppmv @3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-302.2	N		400 ppmv @3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-303	N		400 ppmv @3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-305.2	N		400 ppmv dry, @ 3% O <sub>2</sub>	None	N	
	BAAQMD Regulation 9-7-306.2	N		400 ppmv dry, @ 3% O <sub>2</sub>	None	N	
NOx and CO	BAAQMD Regulation 9-7-306.3	N		48 hours non-gaseous fuel testing	Regulation 9-7-503.3	P/M	test records

## VII. Applicable Emission Limits & Compliance Monitoring Requirements (continued)

**Table VII-C**  
**S-3: Yeast Dryer**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	BAAQMD Regulation 6-301	N		Ringelmann No. 1	None	N	
	SIP Regulation 6-301	Y		Ringelmann No. 1	None	N	
	BAAQMD Regulation 6-310	Y		0.15 grain/dscf @ 6% O <sub>2</sub>	None	N	
	BAAQMD Condition 14319 part 1	Y		0.01 grains/dscf	None	N	

## VII. Applicable Emission Limits & Compliance Monitoring Requirements (continued)

**Table VII-D**  
**S-10: Fermenter #2**  
**S-11: Fermenter #3**  
**S-12: Fermenter #4**  
**S-13: Fermenter #7**  
**S-14: Fermenter A**  
**S-15: Fermenter B**

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD Condition 13149 part 1	Y		300 ppmv carbon trade yeast batch average, as emitted	BAAQMD Condition 13149 part 3a	P/E <sup>1</sup>	parametric sampling and analysis
	BAAQMD Condition 13149 part 1	Y		450 ppmv carbon first generation yeast batch average, as emitted	BAAQMD Condition 13149 part 3a	P/E <sup>1</sup>	parametric sampling and analysis
	BAAQMD Condition 13149 part 1	Y		900 ppmv carbon stock yeast batch average, as emitted	BAAQMD Condition 13149 part 3a	P/E <sup>1</sup>	parametric sampling and analysis

<sup>1</sup> hourly during each fermentation batch



## VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally found in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

**Table VIII**

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD Condition #260, part 3	Fuel Oil Sulfur Concentration Limits	Manual of Procedures, Volume III, Method 10, Determination of Sulfur in Fuel Oils
BAAQMD Condition #13149, part 1	Carbon Concentration Limits	1) BAAQMD Manual of Procedures, Volume IV, ST-7, or 2) EPA Method 25 or 25A
BAAQMD Condition # 14319 part 1	Particulate Concentration Limits	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD Regulation 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
SIP Regulation 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD Regulation 6-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulate Sampling
BAAQMD Regulation 9-1-302	General Emission Limitation	Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide, Continuous Sampling, or ST-19B, Total Sulfur Oxides Integrated Sample
BAAQMD Regulation 9-1-304	Fuel Burning (Liquid and Solid Fuels)	Manual of Procedures, Volume III, Method 10, Determination of Sulfur in Fuel Oils.
BAAQMD Regulation 9-7-301.1	Performance Standard, NO <sub>x</sub> , Gaseous Fuel	Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD Regulation 9-7-301.2	Performance Standard, CO, Gaseous Fuel	Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling

## VIII. Test Methods (continued)

**Table VIII** (continued)

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD Regulation 9-7-302.1	Performance Standard, NO <sub>x</sub> , Non-Gaseous Fuel	Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD Regulation 9-7-302.2	Performance Standard, CO, Non-Gaseous Fuel	Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD Regulation 9-7-303	Emission Limits - Gaseous and Non-Gaseous Fuel, NO <sub>x</sub> and CO	Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling, Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD Regulation 9-7-304.1	Low Fuel Usage Requirements, O <sub>2</sub> Operating Standard, O <sub>2</sub>	Manual of Procedures, Volume IV, ST-14, Oxygen, Continuous Sampling
BAAQMD Regulation 9-7-305.1	Natural Gas Curtailment Performance Standard, NO <sub>x</sub>	Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling or ST-13B, Oxides of Nitrogen, Iterated Sample and ST-14, Oxygen, Continuous Sampling
BAAQMD Regulation 9-7-305.2	Natural Gas Curtailment Performance Standard, CO	Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD Regulation 9-7-306.1	Equipment Testing - Non-Gaseous Fuel NO <sub>x</sub> Performance Standard	Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling or ST-13B, Oxides of Nitrogen, Iterated Sample and ST-14, Oxygen, Continuous Sampling
BAAQMD Regulation 9-7-306.2	Equipment Testing - Non-Gaseous Fuel CO Performance Standard	Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling

## **IX. GLOSSARY**

### **AB2588**

State Assembly Bill 2588. Requires facilities to report emissions of toxic pollutants and based upon the level of these emissions may require risk assessment and public notification.

### **BAAQMD**

Bay Area Air Quality Management District

### **BACT**

Best Available Control Technology

### **Basis**

The underlying authority which allows the District to impose requirements.

### **CAA**

The federal Clean Air Act

### **CAAQS**

California Ambient Air Quality Standards

### **CEQA**

California Environmental Quality Act

### **CFR**

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

### **CO**

Carbon Monoxide

### **Cumulative Increase**

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

### **District**

The Bay Area Air Quality Management District

### **EPA**

The federal Environmental Protection Agency.

### **Excluded**

Not subject to any District Regulations.

## **IX. Glossary (continued)**

### **Federally Enforceable, FE**

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

### **GLC**

Ground Level Concentration

### **HAP**

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

### **Major Facility**

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

### **MFR**

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

### **MOP**

The District's Manual of Procedures.

### **NAAQS**

National Ambient Air Quality Standards

### **NESHAPS**

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

### **NMHC**

Non-methane Hydrocarbons

### **NO<sub>x</sub>**

Oxides of nitrogen.

### **NSPS**

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

## **IX. Glossary (continued)**

### **NSR**

New Source Review. A federal program for preconstruction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

### **Offset Requirement**

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any on site contemporaneous emission reduction credits. Applies to emissions of POC, NO<sub>x</sub>, PM<sub>10</sub>, and SO<sub>2</sub>.

### **Phase II Acid Rain Facility**

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

### **POC**

Precursor Organic Compounds

### **PM**

Total Particulate Matter

### **PM<sub>10</sub>**

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

### **PSD**

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

### **RACT**

Reasonably Available Control Technology, as defined in Regulation 2, Rule 1

### **RMP**

Risk Management Plan, as defined in 40 CFR Part 68

### **SIP**

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Ambient Air Quality Standards. Mandated by Title I of the Act.

### **SO<sub>2</sub>**

Sulfur dioxide

## IX. Glossary (continued)

### **Title V**

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

### **VOC**

Volatile Organic Compounds

### **Units of Measure:**

bhp	=	brake-horsepower
Btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m <sup>2</sup>	=	square meter
min	=	minute
MM	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

## **X. APPENDIX A - APPLICABLE STATE IMPLEMENTATION PLAN**

See Attachments